

1 GREY AND KOHLWECK
Attorneys At Law
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3 Santa Monica, CA 90403
4 (213) 820-4676
5 Attorneys for Plaintiff

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 CHURCH OF SCIENTOLOGY OF) No. C 420 153
CALIFORNIA, A California)
12 Corporation,) PLAINTIFF'S FIRST SET OF
) REQUESTS FOR ADMISSIONS
13 Plaintiff,) [C.C.P. 2033]
)
14 v.)
)
15 GERALD ARMSTRONG, DOES 1)
through 10, inclusive.)
16)
)
17 Defendants.)
-----)

18 TO: Defendant, GERALD ARMSTRONG, and to his attorneys of
19 record, CONTOS AND BUNCH, Attorneys at Law:
20 Plaintiff, CHURCH OF SCIENTOLOGY OF CALIFORNIA, INC, re-
21 quests you to admit to the genuineness of the following documents
22 and truth of the following matters of fact within fifteen (15)
23 days from the date of service of this request on you:
24 1. That the original of the Affidavit of Gerry Armstrong,
25 a copy of which is attached hereto and identified as Exhibit A
26 and made a part hereof, is a genuine affidavit duly executed by
27 Defendant, Gerald Armstrong.
28 2. That the original of the Affidavit of Gerry Armstrong,

1 a copy of which is attached hereto and identified as Exhibit B
2 and made a part hereof, is a genuine affidavit duly executed by
3 Defendant, Gerald Armstrong.

4 3. That the original of the Nondisclosure and Release
5 Bond, a copy of which is attached hereto and identified as Exhi-
6 bit C and made a part hereof, is a genuine nondisclosure and
7 release bond executed by Defendant, Gerald Armstrong.

8 4. That the original of the correspondence dated 26 May
9 1982 to Mr. Gerry Armstrong from John G. Peterson, a copy of
10 which is attached hereto and indentified as Exhibit D, and made a
11 part hereof, was received by Defendant Gerald Armstrong.

12 5. That the original of the correspondence dated 27 May
13 1982 to Mr. Gerry Armstrong from John G. Peterson, a copy of
14 which is attached hereto and indentified as Exhibit E, and made a
15 part hereof, was received by Defendant Gerald Armstrong.

16 6. That the original of the correspondence dated 21 June
17 1982 to Mr. Gerry Armstrong from John G. Peterson, a copy of
18 which is attached hereto and identified as Exhibit F, and made a
19 part hereof, was received by Defendant Gerald Armstrong.

20 7. That Defendant, Gerald Armstrong, is currently a resi-
21 dent of Orange County, California.

22 8. That during the period between February 1971 through
23 December 1981, Defendant, Gerald Armstrong was a staff member of
24 various Scientology organizations.

25 9. That at all times during the period of January 1, 1976
26 to December 1, 1981, Defendant, Gerald Armstrong was a member of
27 the Sea Organization of Scientology.

28 10. That in 1979, and at other times, as a member of the

1 Sea Organization, Defendant, Gerald Armstrong, took a vow of
2 confidentiality.

3 11. That during the period from January 1980 through Decem-
4 ber 1981, Defendant Gerald Armstrong was in charge of the Ar-
5 chives Project for the Church of Scientology of California

6 12. That Defendant, Gerald Armstrong, authored the document
7 dated 15 Oct 1980, a copy of which is attached hereto and identi-
8 fied as Exhibit G and made a part hereof.

9 13. That the Archives Project involved the gathering and
10 maintenance of information, artifacts and memorabilia concerning
11 the religion of Scientology, Dianetics, L. Ron Hubbard and Mary
12 Sue Hubbard.

13 14. That, as part of his responsibilities for the Archives
14 project, Defendant, Gerald Armstrong, was to locate and maintain
15 documents, information, and artifacts regarding the early history
16 of Dianetics and Scientology.

17 15. That, as part of his responsibilities for the Archives
18 Project, Defendant, Gerald Armstrong, was to locate and maintain
19 documents, information, and artifacts regarding the founder of
20 the religion of Scientology, L. Ron Hubbard.

21 16. That as part of his duties concerning the Archives
22 Project, Defendant, Gerald Armstrong was authorized by the Church
23 of Scientology of California to travel and interview persons
24 concerning the history of Dianetics, Scientology, and about L.
25 Ron Hubbard.

26 17. That as part of his duties concerning the Archives
27 Project, Defendant Gerald Armstrong was empowered by the Church
28 of Scientology of California to negotiate for the purchase of

1 materials and artifacts concerning the history of Dianetics and
2 Scientology and the life of L. Ron Hubbard.

3 18. That at the time Defendant, Gerald Armstrong was in
4 charge of the Archives Project, said project was located at 4833
5 Fountain Ave., Los Angeles, California.

6 19. That as part of his responsibilities concerning the
7 Archives Project, Defendant, Gerald Armstrong was responsible for
8 personally coordinating with Omar V. Garrison, the author who had
9 been retained by Plaintiff, Church of Scientology of California,
10 to write the authorized biography of L. Ron Hubbard, and to
11 provide said author with any information that he might require
12 for said biography.

13 20. That at the time that Defendant, Gerald Armstrong was
14 in charge of the Archives Project, all materials contained in
15 said project were the personal property of Defendant, Church of
16 Scientology of California.

17 21. That at the time that Defendant, Gerald Armstrong was
18 in charge of the Archives Project, he made copies of materials
19 contained in the Archives Project and removed said copies from
20 the Archives Project.

21 22. That at the time that Defendant, Gerald Armstrong was
22 in charge of the Archives Project, he removed original materials
23 from the Archives Project.

24 23. That at the present time, Defendant, Gerald Armstrong,
25 maintains in his possession, copies of materials contained in the
26 Archives Project at the time that he was responsible for said
27 Project.

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1 24. That at the present time, Defendant, Gerald Armstrong,
2 maintains in his possession, original materials that were con-
3 tained in the Archives Project at the time that he was respon-
4 sible for said Project.

5 25. That Defendant, Gerald Armstrong, has provided copies
6 of materials contained in the Archives Project at the time that
7 he was in charge of said Project to individuals who have not been
8 authorized by Plaintiff, Church of Scientology of California to
9 receive such materials.

10 26. That Defendant, Gerald Armstrong, has provided original
11 materials contained in the Archives Project at the time that he
12 was in charge of said Project to individuals who have not been
13 authorized by Plaintiff, Church of Scientology of California to
14 receive such materials.

15 27. That in performing his duties and responsibilities con-
16 cerning the Archives Project, Defendant, Gerald Armstrong was
17 aware of the confidential nature of the materials under his
18 custody and control.

19 28. That in making copies of materials contained in the
20 Archives Project, Defendant, Gerald Armstrong, used supplies and
21 equipment that was the property of Plaintiff, the Church of
22 Scientology of California.

23 29. That Defendant, Gerald Armstrong acted without authori-
24 ty or approval in making copies, for his own use and possession,
25 of materials contained in the Archives Project.

26 30. That Defendant, Gerald Armstrong acted without author-
27 ity or approval in retaining, for his own use and possession,
28 materials contained in the Archives Project.

1 IF YOU FAIL TO COMPLY WITH THE PROVISIONS OF SECTION 2033 OF THE
2 CODE OF CIVIL PROCEDURE WITH RESPECT TO THIS REQUEST FOR ADMIS-
3 SIONS, EACH OF THE MATTERS OF WHICH AN ADMISSION IS REQUESTED
4 WILL BE DEEMED ADMITTED.

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Dated: August 6, 1982

GREY AND KOHLWECK
Attorneys At Law

By: Carl E. Kohlweck
CARL E. KOHLWECK

CERTIFICATE OF SERVICE

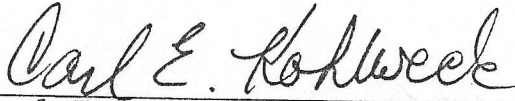
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3 I certify and state that I am and was, at all times herein
4 mentioned, a citizen of the United States and a resident of the
5 County of Los Angeles, over the age of eighteen years, and not a
6 party to or interested in the within action; that my business
7 address is 1821 Wilshire Boulevard, Suite 210, Santa Monica, CA
8 90403.

9 That on August 6, 1982, I served the within REQUEST FOR
10 ADMISSIONS upon counsel named below by causing the same to be hand
11 delivered to the following address:

12 CONTOS & BUNCH
13 Attorneys at Law
14 5855 Topanga Canyon Boulevard
Woodland Hills, CA 91367

15 I certify and declare under penalty of perjury that the
16 foregoing is true and correct.

17 Executed at Santa Monica, California, this 6th day of
18 August, 1982.

19
20 
21 Carl E. Kohlweck